

JEFFREY F. BARR, ESQ  
Nevada Bar No. 7269  
ALINA M. SHELL, ESQ.  
Nevada Bar No. 11711  
ARMSTRONG TEASDALE LLP  
1980 Festival Plaza Drive, Suite 750  
Las Vegas, Nevada 89135  
Telephone: 702.678.5070  
Facsimile: 702.878.9995  
[jbarr@atllp.com](mailto:jbarr@atllp.com)  
[ashell@atllp.com](mailto:ashell@atllp.com)

*Attorneys for Defendant Corrections Officer Isaiah Smith*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

VICTOR PEREZ, as Special Administrator of  
the Estate of CARLOS PEREZ, deceased;  
VICTOR PEREZ, as the Guardian Ad Litem for  
SOPHIA ELISE PEREZ, a minor; VICTOR  
PEREZ, as the Guardian Ad Litem for  
ALEXANDER ISRYAL PEREZ, a minor; and  
MYRA PEREZ, individually,

Plaintiff,

v.

STATE OF NEVADA; DIRECTOR GREG  
COX, individually; WARDEN DWIGHT  
NEVEN, individually; ASSISTANT WARDEN  
TIMOTHY FILSON, individually; COT.  
RAMOS, individually; LIEUTENANT  
OLIVER, individually; CORRECTIONS  
OFFICER CASTRO, individually;  
CORRECTIONS OFFICER SMITH,  
individually; and DOES 1-X, inclusive; and  
ROES 1-X, inclusive,

Defendants.

Case No.: 2:15-CV-01572-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
SUBMISSION OF JOINT PRETRIAL  
ORDER  
(Third Request)**

Pursuant to LR IA 6-1, 6-2 and LR 26-4, Defendant Isaiah Smith, by and through his counsel  
of record Jeffrey F. Barr, Esq. and Alina M. Shell of the law firm of Armstrong Teasdale LLP;  
Plaintiff Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and  
through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill; Defendants, State of

1 Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W.  
2 Neven and Ronald Oliver, by and through their counsel, Kiel Ireland, Esq., of the Attorney General's  
3 Office; Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the  
4 law firm of Lewis Brisbois Bisgaard & Smith, LLP; and Defendant Jeff Castro, by and through his  
5 counsel, Craig R. Anderson, Esq., of the law firm of Marquis Aurbach Chtd., hereby respectfully  
6 submit this Stipulation and Order Extending the Deadline for Submission of Joint Pretrial Order  
7 currently due on November 10, 2022 an additional thirty (30) days, up to and including December 12,  
8 2022.

9 This Court previously denied a joint unopposed motion to extend the deadline for submission  
10 of the Joint Pretrial Order on September 19, 2022, and then granted a modified version of the same  
11 request [ECF No. 221, 223.] Hence, this is the third request for an extension.

12 This stipulated request for an extension is made in good faith and not for the purposes of  
13 delay. Counsel for Defendant Jeff Castro is currently out of the jurisdiction through November 11,  
14 2022 and will be traveling on the week of November 14, 2022 for an oral argument before the United  
15 States Court of Appeals for the Ninth Circuit. Counsel for Defendants State of Nevada ex rel Nevada  
16 Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver  
17 also require additional time due to recent changes in representation, as former counsel Steven  
18 Shevorski, Esq. and Akke Levin, Esq. are no longer with the Attorney General's office. Further,  
19 current senior counsel for Defendants State of Nevada ex rel Nevada Department of Corrections,  
20 James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver is currently the Attorney  
21 General's point person for election litigation and is therefore unable to review and provide additions  
22 to the joint pretrial order before the current November 10, 2022 deadline.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

WHEREFORE the parties stipulate that the time for parties to submit the joint pretrial order be extended an additional thirty (3) days, up to and including December 12, 2022.

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: November 14, 2022.

**ARMSTRONG TEASDALE LLP**

/s/ Alina M. Shell

Jeffrey F. Barr, Nev. Bar No. 7269  
Alina M. Shell, Nev. Bar No. 11711  
3770 Howard Hughes Parkway, Suite 200  
Las Vegas, Nevada 89169  
*Attorneys for Isaiah Smith*

**CLARK HILL PLLC**

/s/ Paola M. Armeni

Paola M. Armeni, Nev. Bar No. 8357  
3800 Howard Hughes Pkwy., #500  
Las Vegas, Nevada 89169  
*Attorneys for Plaintiffs*

**LEWIS BRISBOIS BISGAARD & SMITH**

/s/ Robert W. Freeman

Robert W. Freeman, Jr., Nev. Bar No. 3062  
6385 S. Rainbow Blvd., Ste. 600  
Las Vegas, NV 89118  
*Attorneys for Defendant Ramos*

**AARON FORD, Attorney General**

/s/ Kiel Ireland

Kiel Ireland, Nev. Bar No. 15368  
555 E. Washington Ave., Ste. 3900  
Las Vegas, NV 89101  
*Attorneys for Defendants State of Nevada,  
Dwight Neven, James Greg Cox, Ronald  
Oliver and Timothy Filson*

**MARQUIS & AURBACH**

/s/ Craig R. Anderson

Craig R. Anderson, Nev. Bar No. 6882  
10001 Park Run Drive  
Las Vegas, NV 89145  
*Attorneys for Defendant Castro*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 10th day of November 2022, **I SERVED A TRUE AND CORRECT COPY OF THE FORGOING STIPULATION AND ORDER TO EXTEND DEADLINE FOR SUBMISSION OF JOINT PRETRIAL ORDER (Third Request)** was submitted with the clerk of the court through case management/electronic filing system.

Paola M. Armeni, Esq.  
Gia N. Marina, Esq.  
CLARK HILL PLLC  
3800 Howard Hughes Parkway  
Suite 500  
Las Vegas, Nevada 89169  
*Attorneys for Plaintiff*

Robert W. Freeman, Jr., Esq.  
E. Matthew Freeman, Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 S. Rainbow Blvd.,  
Suite 600  
Las Vegas, NV 89118  
*Attorneys for Defendant Ramos*

Aaron D. Ford, Esq.  
Kiel B. Ireland, Esq.  
Craig A. Newby, Esq.  
NEVADA ATTORNEY GENERALS  
OFFICE  
100 N. Carson Street  
Carson City, Nevada 89701  
*Attorneys for Defendants State of Nevada,  
Dwight Neven, James Greg Cox, Ronald  
Oliver and Timothy Filson*

Craig R. Anderson, Esq.  
Jackie V. Nichols, Esq.  
MARQUIS & AURBACH & COFFING  
10001 Park Run Drive  
Las Vegas, NV 89145  
*Attorneys for Defendant Castro*

/s/ Allie Villarreal

Employee of Armstrong Teasdale LLP